

Raghu Nagam <RNagam@wi.tna-inc .com> To: JohnJ OGrady/P5 UCEPA US@EPA

CC:

Subject: Fansteel QAPP Comments TN

05/24/2001 03:58 PM

Hi John,
Please find our comments on Earth Sciences' QAFF.
<<EScnsQAPP.wpd>>

EScnsQAPP.wp

EPA Region 5 Records Ctr.

229965

May 24, 2001

Mr. John O Grady Remedial Project Manager U.S. Environmental Protection Agency Region 5 77 West Jackson Boulevard Chicago, IL 60604

Subject:

Quality Assurance Project Plan

Fansteel, Inc

Number One Tantalum Place

North Chicago, Illinois

U.S. EPA Order No. 05-2207-YTWW

Dear Mr. O' Grady:

T N & Associates, Inc. (TN&A), has reviewed Earth Sciences Consultants, Inc.'s Quality Assurance Project Plan for Fansteel Inc., submitted to United States Environmental Protection Agency (US. EPA) Region V. TN&A's comments are provided in Attachment A.

TN&A appreciates this opportunity to provide these comments. Should you have any questions or comments, please contact me at 312/220-7000.

Sincerely,

Raghu Nagam Project Manager

Attachment A - TN&A Comments

cc: Dave Voight, T N & Associates, Inc.

Attachment A

Fansteel Inc. Quality Assurance Project Plan Review T N & Associates, Inc.

The following are T N & Associates, Inc's. (TN&A) comments on the Quality Assurance Project Plan (QAPP) for Fansteel Inc., prepared by Earth Sciences Consultants, Inc.

General Comments:

1. Changes incorporated in the Engineering Evaluation/Cost Analysis (EE/CA) Work Plan, in response to United States Environmental Protection Agency (USEPA) comments, should be addressed in this report.

Specific Comments:

- 1. Page 4, Section 1.5.1 Specific Objectives and Associated Tasks
 Revise, in accordance with the general comment, to include the number of samples, analytical parameters, and associated quality assurance and quality control samples.
 These changes are also to be reflected in Table 1, Appendix B.
- 2. Page 4, Section 1.5.2 Project Target Parameters and Intended Data Usages
 The Tiered Approach to Corrective Action Objectives (TACO) action levels for
 some compounds (Table 2 & 3, Appendix B) are lower than the reporting limits.
 Please verify with the laboratory that lower reporting limits can be achieved for all
 compounds.
- 3. Page 1, Section 7.1 Field Analytical Procedures
 A photo ionization detector (PID) or other similar instrument would be necessary if samples would be screened for volatile compounds prior to collection (Refer to Section 9.1.1 PID data collection).
- 4. Page 3, Section 13.1 Field Corrective Action
 Any changes in the sampling program should be reported to USEPA prior to implementation.
- 5. Page C-10, Appendix C, Section C.1.1.3.4.6 Preservation of Groundwater Samples

 All samples must be preserved on-site for maintaining sample integrity.